

# Curbing Confined Space Confusion

**A**s code interpretations continue to change and improvements slowly morph into normal practice, when the time comes to tackle OSHA's confined space standard, where do you start?

## SPACE EVALUATIONS:

The first phase of tackling OSHA 1910.146, is identifying if you have confined spaces. This is done by performing space evaluations. Typically the details of how we define the terms "limited" and "restricted" in regards to egress raise the biggest questions when performing these evaluations. For this we look to life safety codes and regulatory interpretations for defining restricted. Based on regulatory interpretations in your area, the question may become, "is the access to the space smaller than an exit door?"

Once you've determined a space is a confined space, the next step is to determine if the confined space is permit required. Could the inside configuration trap an entrant, could it have a hazardous atmosphere, engulfment hazard, or other hazards like moving parts, chemicals, fall, or dust? If you've answered yes to any of those questions, the space is considered permit required. Some examples of permit required confined spaces might include condensers without full size exit doors, air makeup units and duct work, spiral freezers (this could be based on the employee's location within the freezer), and chillers.

## TO ENTER, OR NOT TO ENTER?

If you've found that you have permit required confined spaces, your facility has two options: To enter, or not to enter. If you determine spaces will not be entered, awareness training and signage is adequate. If you determine your employees or hired contractors will need to enter at least one of the spaces, additional steps are required — the first of those being the completion of confined space assessments.

## CONFINED SPACE ASSESSMENTS:

As an employer you are required to notify your employees and contractors of space hazards and elimination/control

measures for those hazards. This is done through an assessment of the space. The objective of an assessment is to identify potential problems and how to fix them. Subjects such as identification of space hazards, hazard elimination and control measures, entry protocols, and rescue are all considered assessment staples.

## HOW MUCH TRAINING?

If you've determined only contractors will enter spaces on your site, those that hire and manage contractors will need additional training. Training should

training and done all at once. If your site identified potential respiratory hazards within spaces your team will enter, you may also want to evaluate training your team on SCBAs. On site teams are helpful if your location is going to routinely enter spaces, enter a limited variety of spaces, or is in an area where the fire department's rescue team cannot perform a rescue in a timely manner due to distance from your location or being on another call. When considering what would be timely, a good rule of thumb is that rescuers should be in the space

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include how to understand if the contractor has adequate training themselves and is performing a safe entry with the correct entry and rescue equipment. If however, you've decided your employees will enter confined spaces, their training should cover the duties of entrants, attendants, supervisors, your permit, non-entry rescue, the equipment your team will use, and a means to verify participants are competent.

## RESCUE: INTERNAL VS. EXTERNAL

Before sending an entrant into a space, you are required to have a way to remove them from the space should they have an emergency. This can be accomplished by having a trained confined space rescue team on site, using a fire department, or hiring a standby confined space rescue company.

Internal teams require annual refresher rescue training. Typically rescue training is added on to the confined space entrant/attendant/supervisor

treating the victim within 6 minutes of the emergency notification.

Using external support may be helpful if confined spaces are rarely entered or if there is a space that presents a unique or challenging rescue for which a professional team might be better suited. External support may also be helpful if there is a written agreement with a fire department that has a dedicated confined space rescue team near the facility.

## SPACE RECLASSIFICATION:

When discussing reclassification, it's important to understand reclassification cannot apply to every space. To determine if a permit required confined space can be reclassified, first evaluate if the permit space poses no actual or potential atmospheric hazard. The key word is "potential". For example, consider a new, temporary, or transferred employee performing LOTO or double block and bleed procedures. The potential for error may be increased

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with employees less familiar with the equipment performing these tasks. If chemicals will be added or if welding is taking place, this could create an atmospheric hazard. Next, consider if all other hazards within the space are eliminated without entry into the space. Here, the key word is eliminated, and not controlled. For this, think of fall hazards, freely rotating ribbons/augers, internal configuration, and engulfment hazards.

The remaining steps include justification for the reclassification by using the pre-entry portion of the permit. With part of the permit completed, why reclassify? Many entries take place on weekends and off-shifts when crews are smaller, and overtime becomes a factor. The main advantage to reclassification, is not needing a rescue team assigned and ready, or an attendant present. But it's also important to consider how anyone would know if the entrant has a medical event in the space. Who calls for help if there is no attendant, and who performs the rescue if there is no rescue team identified and ready?

### COMMON PROBLEMS:

When applying confined space concepts in the field, challenges often occur. Training can be either one of your greatest successes as a team or one of the greatest pitfalls. Most simply put, training should cover what the team will be expected to do in the field, with the main goal being to improve the safety of your team and drive down risk. Regardless of if the training is done internally or externally, if the training fails to cover what the team is expected to do on the job, retraining will be required.

Another potential snag awaiting you is equipment. A common practice is to buy equipment and perform assessments later. This can result in gear that doesn't work correctly for your spaces, or doesn't hold up in your environments. Also common, is not inspecting the confined space gear. This can result in expired gas meters, meters calibrated with expired calibration gas, broken winches, empty SCBA bottles, or pins missing on tripod or davit systems when they're pulled for an entry.

Lastly is the ever-present danger of complacency. A large percentage of inju-

ries tie back to non-routine tasks, and a large percentage of tasks completed within confined spaces tend to be non-routine tasks. This could present itself in the form of complacency with alarming meters, the hazards within the space, or tenured yet untrained employees performing confined space duties as the entrant, attendant, rescuer, or acting as the permit's authorizing supervisor for an entry.

### SMOOTH SAILING:

Although there can be grave risks when not approached correctly, confined space entries are successfully completed all across the country each week without a glitch. When the right processes, procedures, and permits are coupled with well executed training and a respect of the space hazards, teams can perform entries- and even rescues- like a well-oiled machine, helping to keep your location up and running without missing a beat.

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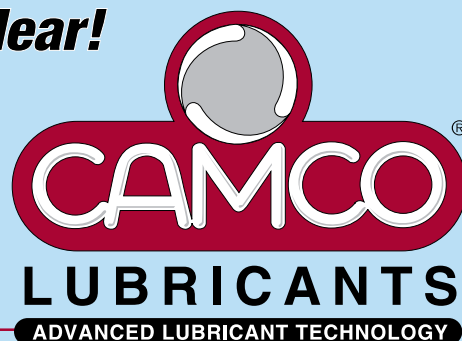
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